## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA **SOUTHERN DIVISION**

DEFENDA
DEFENDANT'S EXHIBIT

NANCY MARTIN and, MARY BETH BRACKIN,	
Plaintiffs,	<b>)</b>
<b>v.</b>	) Case No. 1:05-CV-1172-MEF
CITY OF DOTHAN and JUDGE ROSE EVANS-GORDON,	) }
Defendants.	) )

## **RE-NOTICE OF DEPOSITION AND** REQUEST FOR PRODUCTION OF DOCUMENTS

Please take notice that on October 29, 2007, at 9:00 a.m. in the Sakado Room of the Dothan Civic Center, 126 N. St. Andrews Street, Dothan, Alabama, Defendants will take the testimony by deposition upon oral examination of Plaintiff, NANCY MARTIN for the purpose of discovery or for use as evidence in this action pursuant to the Federal Rules of Civil Procedure, before some person who is authorized to administer oaths for such purpose.

Plaintiff, Nancy Martin, is further requested to bring with her to the deposition the following:

- Any and all documents provided by defendants to plaintiff and retained by 1. plaintiff,
- 2. Any and all documents, writings, notes, diaries, calendars, recordings (audio or visual) that plaintiff contends supports or relates to the allegations in her complaint.

- 3. Any and all documents, notes, writings or items referred to in No. 2 above that plaintiff reviewed to prepare for her deposition.
- 4. Any and all tax returns, W-2 forms, and 1099 forms filed by plaintiff with the Internal Revenue Service from 2002 to the present.

Carol Sue Nelson Attorney for Defendants

## **OF COUNSEL:**

MAYNARD, COOPER & GALE, P.C. 1901 Sixth Avenue North 2400 Regions/Harbert Plaza Birmingham, AL 35203-2618 (205) 254-1000 (205) 254-1999 (Fax)

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing Re-Notice of Deposition and Request for Production has been served upon the following listed persons by placing a copy of the same in the United States Mail, first-class postage pre-paid and properly addressed as follows:

Ishmael Jaffree, Esq. 951 Government Street Mobile, AL 36604-244

F. Lenton White, II, Esq. City of Dothan City Attorney's Office P.O. Box 2128 Dothan, Alabama 36303

Joe E. Herring, Jr., Esq. City of Dothan City Attorney's Office P.O. Box 2128 Dothan, Alabama 36303

This the 23rd day of October, 2007.

OF COUNSEL